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SCOTT ELLIOTT

TELEPHONE (803) 771-0555  
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August 25, 2009

Charles L. A. Terreni, Esquire  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

RE: Genesis Telecommunications, LLC v. United Telephone Company  
of the Carolinas d/b/a Embarq  
Docket No. 2009-311-C

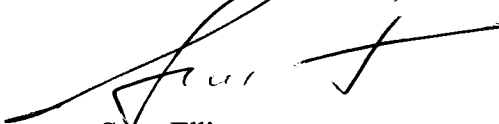
Dear Mr. Terreni:

Enclosed please find for filing an original and ten copies of a Motion for Admission *Pro Hac Vice* in the above referenced matter. I have also included an extra copy, which I would ask you to date stamp and return to me in the enclosed self-addressed, stamped envelope.

Thank you for your assistance, and please call me if you should have any questions regarding this matter.

Sincerely,

ELLIOTT & ELLIOTT, PA



Scott Elliott

SE/jcl

Enclosures

cc: All parties of record w/enc.

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
DOCKET NO. 2009-311-C**

IN THE MATTER OF:	)	
	)	
Genesis Telecommunications, LLC, v.	)	<b>MOTION FOR ADMISSION</b>
United Telephone Company of the Carolinas	)	<b><i>Pro Hac Vice</i></b>
d/b/a Embarq	)	

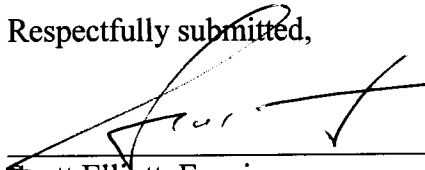
United Telephone Company of the Carolinas d/b/a Embarq ( "Embarq") hereby move the Public Service Commission of South Carolina ("Commission") to permit Susan S. Masterton, Esquire to practice pro hac vice before the Commission in the above-captioned matter.

Pursuant to SCACR 404, Ms. Masterton, together with counsel of record Scott Elliott, have filed a *Verified Application for Admission Pro Hac Vice* with the South Carolina Supreme Court for this case. Attached hereto is a stamped copy of the Verified Application as filed with the Supreme Court.

WHEREFORE, as the provisions set forth in SCARC 404 have been satisfied, United Telephone Company of the Carolinas d/b/a Embarq requests this motion be granted.

Respectfully submitted,

August 25, 2009

  
\_\_\_\_\_  
Scott Elliott, Esquire  
ELLIOTT & ELLIOTT, P.A.  
721 Olive Street  
Columbia, South Carolina 29205  
Telephone: 803-771-0555

Counsel for United Telephone Company of the  
Carolinas d/b/a Embarq

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA



Genesis Telecommunications, LLC

South Carolina  
Public Service Commission

2009-311-C

Plaintiff

Case No.

Court

vs.

United Telephone of the Carolinas d/b/a Embarq

Mailing Address of Court: Post Office Box 11649

Columbia, South Carolina 29210

Defendant

Comes now Susan Spingler Masterton, applicant herein, and respectfully represents the following:

1. Applicant resides at:

930 Maplewood Avenue

Street Address

Tallahassee

Leon

Florida

32303

City

County

State

Zip Code

850-385-3120

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Embarq, with offices at, at

1313 Blair Stone Road

Street Address

Tallahassee

Leon

Florida

32301

City

County

State

Zip Code

850-599-1560

Telephone

850-878-0777

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by

Embarq to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since September of 1985, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of Florida where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

Florida Supreme Court	September 1985

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S.C. SUPREME COURT

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Scott Elliot, of the  
Elliott & Elliot law firm, which has offices at:

721 Olive Street

Street Address

Columbia

Richland

South Carolina

29205

City

County

State

Zip Code

803-771-0555

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

N/A

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 19th day of August, 2009.

Sharon Spivey Motley  
APPLICANT

VERIFICATION

STATE OF Florida )

COUNTY OF Leon )

I, Susan Spingler Masterton, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

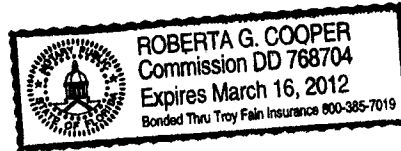
Susan Spingler Masterton  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 19<sup>th</sup> day of August, 2009.

Roberta G. Cooper

Notary Public for the State of Florida

My Commission Expires: 3/16/12



LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 24<sup>th</sup> day of August, 2009.

[Signature]  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
APPLICANT/AFFIANT



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 494224  
Susan Spingler Masterton  
Embarq  
1313 Blirstone Rd.  
Tallahassee, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 19, 1985.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 17th day of August, 2009.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/ssM1:R10

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Genesis Telecommunications, LLC, Complainant/Petitioner v.  
United Telephone of the Carolinas d/b/a Embarq,  
Defendant/Respondent

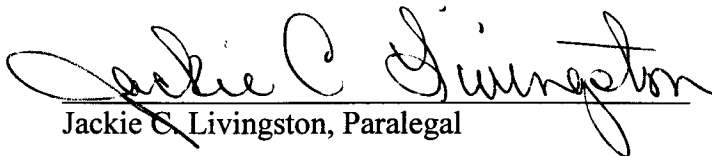
DOCKET NO.: 2009-311-C

PARTIES SERVED: John Lawrence  
Genesis Telecommunications, LLC  
1117 Reynolds Avenue  
Greenwood, SC 29649

Nanette S. Edwards, Esquire  
Office of Regulatory Staff  
P. O. Box 11263  
Columbia, SC 29211

PLEADING: MOTION FOR ADMISSION *PRO HAC VICE*

August 25, 2009

  
Jackie C. Livingston, Paralegal